REMARKS/ARGUMENTS

Claims 1-11 are pending in this application.

Claims 1-11 were rejected under 35 U.S.C. § 103(a) over Fogg (US Patent
6,466,624 B1) in view of Nybo et al. (US Patent Application Publication US
2001/0052933 A1). This rejection is respectfully traversed for the following reasons.

Claims 1-11 comprise as elements: determining a respective displacement vector
field from a comparison of two successive optically acquired images; identifying a
trajectory for each pixel of the optically acquired images from the displacement vector
fields; and applying an operation to the images optically acquired by the detector unit
along the trajectory.

Nybo teaches capturing video with a video camera and converting video into the
MPEG format.

Fogg describes image-enhancement methods for an MPEG stream input.

Fogg cannot be modified to operate on original captured images. Fogg uses the
information embedded in the MPEG stream for image enhancement, and Fogg would not
be operable if, instead of an MPEG stream, the original captured images were provided
on the Fogg's input. See, for example, col. 12, line 63, – col. 13. line 3 of Fogg, cited by
the Examiner in the pending Office Action, page 5.

Therefore, Fogg teaches away from the present invention by relying on the input
being different from the original captured images, and Claims 1-11 would not read on
Fogg modified by Nybo.

Modifying Fogg by Nybo only adds to the Fogg's MPEG processor a camera
producing MPEG video. This combination does not allow implementing any of the
aforementioned elements operating on optically acquired images in Claims 1-11 because
the Fogg component cannot be modified to operate on originally acquired images and
Nybo component only captures video and converts it into MPEG.

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As explained hereinabove, the aforementioned elements of Claims 1-11 are not taught or suggested in Fogg, Nybo, or their combination. Therefore, Claims 1-11 are patentable and nonobvious over Fogg and Nybo under 35 U.S.C. § 103(a) and should be allowed.

Response to Arguments

In response to the aforementioned arguments, in the pending Final Office Action, page 2, Examiner had stated the following:

> Applicants state that Fogg cannot be modified with Nybo since Fogg uses original captured images which suggest that Nybo does not use original captured images. And such a combination of original images with non-original images is not compatible as suggested by the applicants. The examiner notes that Fogg uses both "directly-supplied ('raw') and ... intermediary processed data bitstream elements" in col. 12, lines 59-64. Thus, a combination of Fogg's teaching of using both raw images also known as original captured images with non-original images also known as intermediary processed data bitstream elements such as MPEG with Nybo's non-original images is reasonable.

The above is the full Examiner's response to Applicant's arguments.

Applicant respectfully disagrees. Fogg does not use original captured images, cannot operate on original captured images, and cannot be modified to do so.

In the part quoted by the Examiner, Fogg reads: "bitstream processor 622 preferably operates in the coded domain, analyzing and/or otherwise processing directly-supplied ('raw') and/or intermediately processed data bitstream elements to provide metrics for further processing".

In this quote from Fogg, the "directly-supplied ('raw')" data is the MPEG stream and the "intermediately processed data bitstream elements" are parts of MPEG stream processed by the Fogg's device before being supplied to the Fogg's bitstream processor. This quote from Fogg affirms that Fogg requires an MPEG stream input and cannot operate on original captured images.

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Fogg modified with Nybo results in Fogg operating on MPEG stream produced by Nybo. Fogg modified with Nybo cannot perform the operations recited in Claims 1-11 on original captured images.

It is believed that the present application is in condition for allowance. A Notice of Allowance is respectfully solicited in this case. Should any questions arise, the Examiner is encouraged to contact the undersigned.

                                        Respectfully submitted,

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